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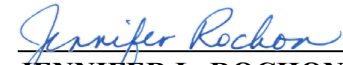
April 3, 2025

The Honorable Jennifer L. Rochon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

The parties' initial pre-trial conference, presently scheduled for April 16, 2025, shall be rescheduled to October 1, 2025 at 12:00 p.m.

**SO ORDERED.**

Dated: April 4, 2025  
New York, New York

  
**JENNIFER L. ROCHON**  
United States District Judge

***Re: 1:25-cv-01266-JLR; Plaintiff's Request to Adjourn the Initial Pretrial Conference Scheduled for April 16, 2025 at 12:00 PM***

Dear Judge Rochon,

The James Law Firm, PLLC represents Plaintiff in the above captioned matter. This matter has been filed as a John Doe against the internet subscriber assigned the referenced IP address. Plaintiff respectfully makes its first request for an adjournment of the Initial Pretrial Conference currently scheduled for April 16, 2025 at 12:00 p.m. until after the Defendant is named and served.

On February 12, 2025, Plaintiff filed the instant case against John Doe subscriber assigned IP address 96.239.70.129 claiming Defendant's direct infringement of Plaintiff's works through BitTorrent protocol.

On March 2, 2025, Plaintiff filed a Motion for Leave to Serve a Third-Party Subpoena Prior to a Rule 26(f) Conference ("Motion for Leave") in order to serve a third-party subpoena on Defendant's ISP.

Pursuant to the Court's January 2, 2025 Order, the Initial Pretrial Conference is currently scheduled for April 16, 2025 at 12:00 pm. Prior to the conference, the parties are required to confer and submit to the Court a proposed Case Management Plan and Scheduling Order.

On March 4, 2025, Plaintiff was granted leave to serve a third-party subpoena prior to a Rule 26(f) Conference on Defendant's ISP to obtain Defendant's identifying information. [CM/ECF 8]. Plaintiff issued the subpoena with a third-party subpoena on or about March 6, 2025 and, in accordance with the time allowances provided to both the ISP and the Defendant, expects to receive the ISP's response on or about July 14, 2025.

Upon receipt of the ISP response, Plaintiff intends to conduct a further investigation to assist in determining whether the individual identified by the ISP is the appropriate defendant for this action, and, if a good faith basis continues to exist, to proceed against that individual (or

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someone else), amend the Complaint, and place the summons and Amended Complaint with the process server to attempt service of process.

Because Defendant has not yet been identified, Plaintiff is unable to anticipate the specific information required in the proposed Case Management Plan and Scheduling Order, including issues such as timing, electronic discovery, or even whether Plaintiff will ultimately proceed against Defendant.

For the foregoing reasons, Plaintiff respectfully requests that the Initial Conference scheduled for April 16, 2025 be adjourned until after the Defendant has been served with the summons and Complaint.

Respectfully Submitted,

By: /s/Jacqueline M. James  
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